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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

September 22, 1995

VIA HAND DELIVERY

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W. - Room 222
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

Re: PR Docket No. 92-257
RM-7956, RM-8031, RM-8352

Dear Mr. Caton:

On behalf of Ross Engineering, we are filing an original and seven (7) copies of its Comments in the above-referenced matter.

If there are any questions, please communicate with the undersigned.

Respectfully submitted,

FLETCHER, HEALD & HILDRETH, P.L.C.

Leonard Robert Raish

Leonard Robert Raish
Counsel for Ross Engineering

LRR:cej
Enclosures

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BEFORE THE

Federal Communications Commission

WASHINGTON, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
)
Amendment of the Commission's) PR Docket No. 92-257
Rules Concerning Maritime) RM-7956
Communications) RM-8031
) RM-8352

To: The Commission

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COMMENTS BY ROSS ENGINEERING

Ross Engineering ("Ross"), by its attorney, hereby submits the comments below on the Further Notice of Proposed Rulemaking ("Further Notice") in the above cited proceeding. The Further Notice was released on May 25, 1995. In the comments below, Ross supports in principle the proposals set forth in the Further Notice. Further, Ross appreciates the Commission's efforts to update its Rules concerning Maritime Mobile radio communications.

I. GENERAL

Ross Engineering is a Florida corporation with its Headquarters located in Largo, Florida. It is a manufacturer of VHF radio communications equipments, an operator of marine VHF coast stations, and a provider of VHF radio services. Ross, through its company officials, has been an active participant in ITU-R Working Parties 8B and 8C.

II. IMPLEMENTATION OF GMDSS IS IMPORTANT

In supporting generally the proposals set forth in the Further Notice, Ross urges the Commission to take further steps toward full implementation of GMDSS. Ross suggests that, having agreed internationally to establish and participate in the GMDSS, the U.S. should now act

more positively to carry out the international agreement.¹ Ross hopes the telecommunications legislation now pending in the Congress (H.R. 1555 and S.652²) will energize further U.S. build-up of GMDSS.

III. FURTHER IMPLEMENTATION OF DSC IS URGED

In its earlier comments in this Docket, Ross supported a U.S. Coast Guard proposal to require minimum DSC capabilities on VHF marine transmitters. Ross continues to support DSC as the standard selective calling protocol in preparation for a nationwide system of VHF public coast stations. Service providers, like Ross, desire to automate. This was one reason why PSTN interconnection protocols have been recommended. Ross is concerned from a marine safety standpoint that allowing automation on an open protocol basis will make full establishment and operation of GMDSS very difficult.³ The Commission is, therefore, urged as it proceeds to rulemaking that it, at least, not set back progress made thus far but leave the way open for progress toward full GMDSS compliance.

IV. TRUNKING AND NARROWBANDING

There are many technical and operational considerations involved in these two subjects. Rather than attempting to establish rules for trunking and narrowbanding in this proceeding. Ross suggests that matter be studied by experts from the marine community and their advice be made available to the Commission for later incorporation in the Commission's Rules. If

¹47 CFR 80 Subpart W (GMDSS) states that applicability is to coast stations and coast earth stations as of February 1, 1992.

²See H.R. 1655 Sec. 307 - Automated Ship Distress and Safety Systems and S.652 Sec. 306 (same title).

³While sales of DSC equipment in the U.S. has been limited, Ross has benefitted from a thriving DSC GMDSS equipment market overseas.

practicable, the Commission might consider some type of "Ad Hoc Advisory Group" or the utilization of RTCM for this purpose.

V. CONCLUSION

In conclusion, Ross urges the Commission to take the foregoing comments into account as it proceeds with the above cited Rulemaking. Otherwise, Ross supports the proposals in the Further Notice and applauds the Commission for its efforts to improve maritime radio communications.

Respectfully submitted,

ROSS ENGINEERING

By: 
Leonard Robert Raish

Its Attorney

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September 22, 1995

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